

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

VITTORIO GUERRIERO, M.D., and  
GREGORY C. NACOPOULOS, D.O.,

Plaintiffs,

VS.

No. 08 C 2388

MERIT LINCOLN PARK, LLC, GREGORY A. CIERLIK, WILLIAM S. MARKEY, M.D., MARIA M. MUNOZ, M.D., CHRISTOS A. GALANOPOULOS, M.D., GEORGE I. SALT, M.D., GEORGE ENGEL, M.D., HOWARD A. MORITZ, M.D., CHRISTINE BRADY, R.N., ERHARD R. CHORLÉ and LYNN A. ELLENBERGER,

## Judge Grady

Mag.Judge Brown

Defendants.

## AGREED MOTION TO EXTEND TIME

Defendants, Erhard R. Chorlé and Lynn A. Ellenberger (collectively, “defendants”), by their attorneys, Kevin M. Forde, Ltd., submit this Agreed Motion to Extend Time, and state as follows:

1. On April 24, 2008, defendants filed their Notice of Removal in the District Court.
2. Pursuant to Fed. R. Civ. P. 81(c), defendant Ellenberger is to answer or present other defenses or objections available under the Federal Rules by May 1, 2008. Defendant Chorlé is to answer or present other defenses or objections available under the Federal Rules by May 7, 2008.
3. Defendants intend to file a joint motion to dismiss the complaint, and ask that this Court extend the time for which defendants are to answer or otherwise plead to plaintiff's complaint until June 2, 2008.

4. Counsel for plaintiff has advised counsel for defendants that he does not object to this motion.

5. Defendants make this motion in good faith and not for purposes of delay.

WHEREFORE, Defendants respectfully request that this Court extend the time for which defendants are to answer or otherwise plead to plaintiff's complaint until June 2, 2008.

Respectfully submitted,

/s/Kevin M. Forde

One of the Attorneys for Defendants

Erhard R. Chorlé and Lynn A. Ellenberger

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